



FEDERAL PREPAREDNESS CIRCULAR

Federal Emergency Management Agency

Washington, D.C. 20472

FPC 66

April 30, 2001

TO: HEADS OF FEDERAL DEPARTMENTS AND AGENCIES

SUBJECT: TEST, TRAINING AND EXERCISE (TT&E) PROGRAM FOR CONTINUITY OF OPERATIONS (COOP)

1. **PURPOSE.** This Federal Preparedness Circular (FPC) provides guidance to Federal Executive Branch departments and agencies for use in developing viable and executable test, training and exercise programs to support the implementation and validation of COOP plans.
2. **APPLICABILITY AND SCOPE.** The provisions of this FPC are applicable to all Federal Executive Branch departments, agencies, and independent organizations, hereinafter referred to as “agencies.”
3. **AUTHORITIES.**
 - a. The National Security Act of 1947, dated July 26, 1947, as amended.
 - b. Executive Order (EO) 12148, Federal Emergency Management, dated July 20, 1979, as amended.
 - c. EO 12472, Assignment of National Security and Emergency Preparedness Telecommunications Functions, dated April 3, 1984.
 - d. EO 12656, Assignment of Emergency Preparedness Responsibilities, dated November 18, 1988, as amended.
 - e. Presidential Decision Directive (PDD) 67, Enduring Constitutional Government and Continuity of Government Operations, dated October 21, 1998.
4. **REFERENCES.**
 - a. PDD 62, Protection Against Unconventional Threats to the Homeland and Americans Overseas, dated May 22, 1998.
 - b. PDD 63, Critical Infrastructure Protection (CIP), dated May 22, 1998.
 - c. Federal Preparedness Circular (FPC) 60, Continuity of the Executive Branch of the Federal Government at the Headquarters Level During National Security Emergencies, dated November 20, 1990.

- d. FPC 65, Federal Executive Branch Continuity of Operations (COOP), dated July 26, 1999.
- e. Title 41 Code of Federal Regulations (CFR), Section 101.20.003, Definitions, and Section 101.20.103-4, Occupant Emergency Program, revised as of July 1, 2000.
- f. Title 36 CFR, Part 1236, Management of Vital Records, revised as of July 1, 2000.

5. DEFINITIONS.

- a. Training - instruction in individual or agency functions, procedures and responsibilities.
- b. Test - demonstration of the correct operation of equipment, procedures, processes and systems that support the organization.
- c. Exercise - evaluation of individual or organizational performance against a set of standards or objectives.

6. POLICY. It is the policy of the United States to have in place a comprehensive and effective program to ensure continuity of essential Federal functions under all circumstances. As a baseline of preparedness for the full range of potential emergencies, all Federal agencies shall have in place a viable COOP capability, which ensures the performance of their essential functions during any emergency or situation that may disrupt normal operations. Inherent in this policy is the requirement that all Federal agencies periodically test, train, and exercise their COOP plans individually and collectively.

7. BACKGROUND. A changing threat environment and recent events emphasize the need for COOP capabilities that enable agencies to continue their essential functions across a broad spectrum of emergencies. FPC 65, in accordance with PDD 67, states that testing, training, and exercising of COOP capabilities are necessary to demonstrate and improve the ability of agencies to execute their essential functions. An agency's essential functions include those functions, stated or implied, which are required to be performed by statute or EO; involve the legal or financial rights of the government or citizens; or directly support important administrative functions or mission-related activities, such as counter terrorism and survival of critical infrastructures.

8. OBJECTIVES. The overall objective of a COOP TT&E Program is to develop, implement and institutionalize a comprehensive, all-hazard program to improve the ability of agencies to effectively manage and execute their COOP plans. The program incorporates the three functional areas of testing systems and equipment, training personnel, and exercising plans and procedures. Specific objectives of a COOP TT&E Program are to:

- a. Validate COOP plans, policies, and procedures.
- b. Ensure that agency personnel are familiar with alert, notification, and deployment procedures.

- c. Ensure agency personnel are sufficiently trained to carry out agency minimum essential operations and functions when deployed at a COOP site or working in a COOP environment.
 - d. Exercise procedures by deploying designated personnel and equipment to an alternate facility to ensure the ability to perform an agency's essential functions and operations during emergency.
 - e. Ensure that backup data and records required to support essential functions at the alternate facility are sufficient, complete and current.
 - f. Test and validate equipment to ensure both internal and external interoperability.
 - g. Ensure agency personnel understand the procedures to phase down COOP operations and transition to normal activities when appropriate.
9. **TT&E PROGRAM.** Agencies should develop a TT&E program that incorporates all levels of the agency, including headquarters, regions, and field locations. Funding for the program is the responsibility of each agency.

The TT&E program should include: policy, guidance, and standards; training courses and materials; exercises of varying types and scope designed to improve the overall organizational response capability to emergency situations; a multi-year TT&E schedule; and evaluation and remedial action programs.

10. **PLANNING CONSIDERATIONS.** The TT&E program should be developed against the objectives identified in Section 8, to ensure agency COOP program viability and readiness. Planning considerations should include:

- a. **Training.** Regularly scheduled training of agency personnel. This training program should consist of:
 - (1) A COOP awareness program for its entire workforce; and
 - (2) A comprehensive readiness program to ensure the preparedness of personnel assigned to carry out essential operations and functions during an event.
- b. **Testing.** Regularly scheduled testing of agency equipment, systems, processes, and procedures used to support the agency during a COOP event. This testing program should:
 - (1) Provide for quarterly evaluations of alert and notification procedures and systems, including instructions for relocation to pre-designated facilities, with and without warning, and during duty and non-duty hours;
 - (2) Evaluate the ability to access current vital records, systems, and data management software and equipment, including classified or sensitive information necessary to perform essential functions;

- (3) Evaluate the interoperability of communications, to include secure capabilities if required; and
 - (4) Evaluate the logistical support, services, and infrastructure systems (e.g., water, electrical power, heating, and air conditioning) at alternate facilities.
- c. Exercising. Regularly scheduled exercising of agency COOP plans to ensure the ability to perform essential operations and functions. This exercising program should:
- (1) Be scaleable in the magnitude of the event and include a variety of potential hazards;
 - (2) Incorporate the deliberate and pre-planned movement of emergency personnel to an alternate facility;
 - (3) Provide for continuation of operations during all phases of the event as outlined in FPC-65; and
 - (4) Include the phase-down of alternate facility operations and return to normal operations (reconstitution).
- d. Joint Initiatives. Participation in joint agency TT&E initiatives, where applicable and feasible by:
- (1) Becoming aware of available TT&E resources;
 - (2) Developing relationships with other agencies;
 - (3) Participating actively in the interagency COOP Working Groups (CWG) and standing and ad hoc committees;
 - (4) Participating in multi-agency COOP exercises; and
 - (5) Participating with other emergency teams as appropriate.

11. TT&E PROGRAM IMPLEMENTATION. The TT&E program should be progressive in nature, building from simple, individual tasks to complex, multi-organizational interactions. An effective program is built on the successful integrating as discussed below.

- a. Training. Regularly scheduled training must be conducted to assure the readiness of all agency emergency and non-emergency personnel. Training plans are developed and implemented to prepare individuals and groups to accomplish certain tasks, using selected equipment, under specific scenarios. This training may encompass a deliberate blend of hands-on activities, seminars, orientations, workshops, on-line or interactive programs, briefings and lectures. Additionally, a variety of public and private sources, including the Federal Emergency Management Agency (FEMA) and the General Services Administration (GSA), offer training in various aspects of COOP.

COOP training should not address the competencies required for “normal” tasks and operations. The purpose of the training is to prepare agency personnel to institute

emergency operations at an alternate facility, to use equipment and procedures and to work with individuals with whom they have little contact during normal day-to-day operations.

The length of the training and the depth of the coverage of the information provided and discussed will vary based on the audience and method of training selected. Typically, if the audience is essential personnel, details of operations, communications, vital records and alternate facilities will require extended discussion. Awareness training for the entire workforce might include topics such as compensation during an event, alert/notification procedures, work location, information dissemination, etc. Major topics or components of the training syllabus could include:

- (1) Definition of COOP.
- (2) Essential elements of COOP.
- (3) Criteria or "triggers" for a COOP event.
- (4) Major operational elements of the specific organization's COOP:
 - COOP leadership and development within the organization;
 - Leadership during a COOP event;
 - Impact of a COOP event on the individual employee;
 - Implementation;
 - Phases of an event;
 - Essential functions and operations;
 - Alternate facilities; and
 - Migration to normal operations.
- (5) Maintenance of COOP plans.

b. Testing. Testing is the technique of demonstrating the correct operation of all equipment, procedures, processes and systems that support the organizational infrastructure. The testing process validates that the equipment and systems conform to specifications and operate in the required environments, and that procedures and processes are viable. Testing is used as the verification and validation technique to confirm that backup equipment and systems closely approximate the operations of the primary equipment and systems. Based on the measures and benchmarks desired, there are a variety of methods that can be used to test the functionality of backup environments. Examples of tests include:

- (1) *Static tests* determine if all the essential components of the equipment and systems are in place and meet the specification and design requirements of the organization.
- (2) *Dynamic tests* verify that all of the required equipment and systems function independently of each other, function in consort with each other and satisfy the operational requirements of the organization.

- (3) *Functional tests* verify that the procedures for operating the equipment and systems in the backup environment are correct. This testing assures that when trained and qualified personnel are required to utilize the backup equipment and systems, the instructions for operation are clear and complete.
- c. Exercising. Exercises are conducted for the purpose of validating elements, both individually and collectively, of the organization's COOP. An exercise should be a realistic rehearsal or simulation of an emergency, in which individuals and organizations demonstrate the tasks that would be expected of them in a real emergency. Exercises should provide emergency simulations that promote preparedness, improve the response capability of individuals and organizations, validate plans, policies, procedures and systems, and determine the effectiveness of the command, control, and communication functions and event-scene activities. Exercises may vary in size and complexity to achieve their respective purposes. Examples of emergency exercises include:
- (1) *Tabletop Exercises* simulate an emergency situation in an informal, stress-free environment. They are designed to elicit constructive discussion as participants examine and resolve problems based on existing plans. There is minimal attempt at simulation, no utilization of equipment or deployment of resources, and no time pressures. The success of these exercises is largely determined by group participation in the identification of problem areas. They provide an excellent format to use in familiarizing newly assigned/appointed personnel and senior officials with established or emerging concepts and/or plans, policies, procedures, systems, and facilities.
 - (2) *Drills* are a coordinated, supervised activity normally used to exercise a single specific operation or function in a single agency. They are also used to provide training with new equipment, to develop new policies or procedures, or to practice and maintain current skills.
 - (3) *Functional Exercises* are fully simulated interactive exercises. They validate the capability of an agency to respond to a simulated emergency testing one or more functions of the plans. They focus on policies, procedures, roles and responsibilities of single or multiple emergency functions before, during, or after any emergency event.
 - (4) *Full-Scale Exercises* simulate actual emergency conditions. They are field exercises designed to evaluate the operational capabilities of the agency's COOP in a highly stressful environment. This realism can be accomplished through mobilization and actual movement of agency emergency personnel, equipment, and resources.

The evaluation of an exercise should identify systemic weaknesses and suggest corrective actions that will enhance agency preparedness. Following an exercise, a comprehensive debriefing and after-action report should be completed. All data collected for the TT&E program should be incorporated into a remedial action plan that provides input for annual COOP revisions. A No-Fault (e.g., non-punitive) Concept should be utilized during all exercises.

12. RESPONSIBILITIES. The following responsibilities should be clearly outlined in agency COOP test, training, and exercise guidance:

a. Each agency head is responsible for:

- (1) Developing and implementing a multi-year strategy and program management plan including a budgeting plan for identifying resource requirements necessary to support its TT&E program.
- (2) Maintaining a roster of fully equipped and trained emergency personnel with the authority to perform essential functions and activities.
- (3) Developing, initiating, and conducting tests, training, and exercises that will:
 - Test their alert and notification plan quarterly, with and without warning, during duty and non-duty hours;
 - Train all members of their team and ensure their knowledge and skills are current;
 - Exercise COOP plans and procedures annually; and
 - Identify and incorporate lessons learned/remedial action plan into annual revisions of the COOP Plan.

b. In addition, GSA is responsible for:

- (1) Developing and implementing a plan, in coordination with FEMA, to issue periodic guidance to agencies on training to promote understanding of, and compliance with, the requirements and objectives of governing directives;
- (2) Developing and conducting a COOP Training Course that is available to all agencies; and,
- (3) Coordinating with FEMA to maintain and revise this FPC as required.

c. In addition, FEMA is responsible for:

- (1) Serving as the Executive Agent for Federal Executive Branch COOP;
- (2) Issuing COOP guidance, in cooperation with the GSA, to promote understanding of and compliance with the requirements and objectives of governing directives;
- (3) Coordinating Federal Executive Branch interagency COOP exercises as outlined in FPC 65;
- (4) Coordinating the development of a multiyear schedule of interagency exercises to be conducted among the Federal Executive Branch agencies;
- (5) Providing guidance, in cooperation with GSA, that imparts methodologies for designing, developing, conducting, and evaluating exercises, to include a corrective action program;

(6) Ensuring a cohesive COOP integration with COG activities and other emergency teams as appropriate; and

(7) Conducting periodic assessments.

13. **DISTRIBUTION.** This FPC is distributed to the heads of Federal Executive Branch departments and agencies, senior policy officials, emergency planners, and other interested parties.

_____/s/_____

Joe M. Allbaugh
Director